

REMARKS

1. Introduction

In the Office Action mailed March 24, 2006, the Examiner rejected claims 1-2, 5-7, 12, and 15 under 35 U.S.C. § 103(a) as being unpatentable over Dowling, U.S. Pat. No. 6,985,931, (“Dowling”) in view of Beach, U.S. Pat. No. 6,901,270 (“Beach”). Additionally, the Examiner rejected claims 3-4, 8-11, 13-14, and 16-19 under 35 U.S.C. § 103(a) as being unpatentable over Dowling in view of Beach and further in view of Thornton et al., U.S. Pub. 2002/0101860 (“Thornton”).

For the reasons set forth below, Applicants request reconsideration and allowance of the claims.

2. Response to the Claim Rejections

a. Claims 1-11

Of these claims, claim 1 is independent. The Examiner rejected claim 1 under § 103 as being unpatentable over Dowling in view of Beach. In response, Applicants submit that the rejection is improper and should be withdrawn because the Examiner’s Dowling/Beach combination does not teach each and every element of claim 1, as set forth below.

Claim 1 recites, *inter alia*, “a second data register communicatively coupled to said PBX and to said first data register, said second data register being able to transmit at least one mobility management message to said first data register, whereby said at least one mobility management message facilitates roaming between said first and second wireless coverage areas by said multi-mode mobile station.” The Examiner acknowledged that Dowling does not teach these elements (Office Action, page 3.) Instead, the Examiner cited Beach, col. 6, lines 18-36 as teaching “a

second data register communicatively coupled to said PBX and to said first data register, said second data register being able to transmit at least one mobility management message to said first data register, whereby said at least one mobility management message facilitates roaming between said first and second wireless coverage areas by said multi-mode mobile station.” (Office Action, page 3.) Applicants submit, however, that Beach does not make up for the deficiencies in Dowling for two reasons.

First, with respect to the “second data register communicatively coupled to said PBX and to said first data register, said second data register being able to transmit at least one mobility management message to said first data register,” the section of Beach cited by the Examiner describes a computer sending data messages to a mobile device and to a mobile unit for the purpose of establishing a voice connection between the mobile device and the mobile unit. (See, e.g., Beach, col. 6, lines 25-30.) The data message described in this section of Beach is not a “mobility management message” as recited in Applicants’ claim 1. Moreover, Beach’s data message is neither sent from “a second data register communicatively coupled to said PBX” nor is Beach’s data message sent to a “first data register” included in a WWAN as recited by Applicants’ claim 1.

Second, with respect to “at least one mobility management message facilitates roaming between said first and second wireless coverage areas by said multi-mode mobile station,” the portion of Beach cited by the Examiner has nothing to do with roaming, but rather, describes a process for establishing telephone like voice communications between a mobile unit and a mobile device. (See, e.g., Beach col. 6, lines 18-36.) Other portions of Beach describe a wireless unit roaming between different wireless access points on the same WLAN. (See, e.g., Beach, col. 9, lines 30-38; col. 10, lines 31-44; col. 12, lines 17-20.) However, nothing in Beach shows

or suggests roaming between a first wireless coverage area in a WWAN and a second wireless coverage area in a WLAN, as recited in Applicants' claim 1.

Thus, Applicants submit that Beach does not teach "a second data register communicatively coupled to said PBX and to said first data register, said second data register being able to transmit at least one mobility management message to said first data register, whereby said at least one mobility management message facilitates roaming between said first and second wireless coverage areas by said multi-mode mobile station," as recited in claim 1.

Accordingly, Applicants submit that claim 1 is allowable over the combination of Dowling and Beach for at least the reasons above. Claims 2-11 depend from claim 1. Thus, Applicants further submit that claims 2-11 are allowable for at least the reason that these claims are dependent on an allowable claim.

b. Claims 12-19

Claim 12 recites, *inter alia*, a "WLAN data register sending a registration message to a WWAN data register in said WWAN." The Examiner cited Dowling, col. 5, lines 16-40 as teaching this element; however, Applicants submit that Dowling does not show or suggest a "WLAN data register sending a registration message to a WWAN data register in said WWAN" as recited in claim 12.

The section of Dowling cited by the Examiner describes a packet transport interface performing registration operations to log the mobile unit in a mobility system. (Dowling, col. 5, lines 35-37.) However, the packet transport interface in Dowling is neither a "WLAN data register" nor a "WWAN data register" as recited in Applicants' claim 12. The "WLAN data register" in claim 12 stores information from a PBX regarding a multi-mode mobile station. The "WWAN data register" in claim 12 receives the registration message as part of a method of

mobility management of a multi-mode mobile station. Dowling does not describe the packet transport interface as performing either of these functions.

Thus, Applicants submit that Dowling does not teach a "WLAN data register sending a registration message to a WWAN data register in said WWAN" as recited in claim 12.

Accordingly, Applicants submit that claim 12 is allowable over the combination of Dowling and Beach for at least the reasons above. Claims 13-19 depend from claim 12. Thus, Applicants further submit that claims 13-19 are allowable for at least the reason that these claims are dependent on an allowable claim.

3. Conclusion

Applicants submit that the present application is in condition for allowance, and notice to that effect is hereby requested. Should the Examiner feel that further dialog would advance the subject application to issuance, the Examiner is invited to telephone the undersigned at any time at (312) 913-0001.

Respectfully submitted,

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